

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

V.

SAMUEL RANDAZZO,

Defendant.

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CASE NO. 1:23-CR-114

JUDGE BLACK

UNOPPOSED MOTION FOR
PROTECTIVE ORDER
REGARDING DISCOVERY

UNOPPOSED MOTION FOR PROTECTIVE ORDER

The UNITED STATES OF AMERICA, by Assistant United States Attorneys Emily N. Glatfelter and Matthew C. Singer, requests this Honorable Court to enter the proposed Protective Order pursuant to Federal Rule of Criminal Procedure 16(d)(1) for good cause shown. *See* Exhibit A (Protective Order Regarding Discovery).

Federal Rule of Criminal Procedure Rule 16(d)(1) empowers district courts to issue protective orders to limit the use and distribution of discovery materials for “good cause.” Fed. R. Crim. P. 16(d)(1). Rule 16(d) “grants the district court ‘broad authority . . . to regulate discovery.’” *United States v. Amawi*, 695 F.3d 457, 472, n.1 (6th Cir. 2012) (quoting *United States v. Campa*, 529 F.3d 980, 995 (11th Cir. 2008)); see *Alderman v. United States*, 394 U.S. 165, 185 (1969). Here, the proposed Protective Order separates discovery into three tiers. As set forth in the Protective Order, its purpose is to protect law enforcement interests and the interests of the defendant, third parties, and witnesses. The government has provided the Protective Order to defense counsel, and the parties have agreed to its terms. Entry of the Protective Order by the Court is thus unopposed and supported by good cause.

For the reasons stated above, the United States respectfully requests that the Court adopt and enter the proposed Protective Order, attached to this motion as Exhibit A.

Respectfully submitted,

Date: December 6, 2023

KENNETH L. PARKER
United States Attorney

s/ Matthew C. Singer

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Court's CM/ECF System this 6th day of December, 2023, which provides electronic notice to all parties.

s/ Matthew C. Singer
MATTHEW C. SINGER (IL 6297632)
Assistant United States Attorney